

EXHIBIT 3

Franklin, Christopher

From: Lubozynski, Matt <mlubozynski@kilpatricktownsend.com>
Sent: Friday, September 06, 2013 11:07 AM
To: Franklin, Christopher
Cc: Moore, Steve; Moore, Susie
Subject: Mediatek Subpoena to Motorola Mobility

Chris,

Thanks for taking the time to speak with me today. This will confirm that I do not need to serve responses to the Requests for Documents on Monday and that we will not be providing such documents on Monday and further that we will not be putting up a deponent on Wednesday, September 11. We agreed to discuss timeframes for a production of documents in response to the subpoena, if Motorola Mobility has any documents and subject to any objections it may have, as well as for a possible deponent, again subject to objections and Motorola Mobility has not as yet agreed to putting up a deponent, on Tuesday at 4:30 P.M. Central time. Thanks.



Matt Lubozynski
Kilpatrick Townsend & Stockton LLP
Suite 2800 | 1100 Peachtree Street NE | Atlanta, GA 30309-4528
office 404 745 2582 | fax 404 541 3349
mlubozynski@kilpatricktownsend.com | [My Profile](#) | [vCard](#)

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Franklin, Christopher

From: Franklin, Christopher
Sent: Wednesday, September 11, 2013 2:51 PM
To: 'Lubozynski, Matt'
Cc: Moore, Steve; Baca, Mike
Subject: RE: MediaTek Subpoena

Matt,

Thank you as well for speaking with me yesterday regarding MediaTek's subpoena to Motorola Mobility LLC ("Motorola"). I write to memorialize additional details from our call:

- You told me that Motorola is not able to produce documents or a witness for deposition by the return dates specified in the subpoena (September 9 and September 11, respectively) and, thus, Motorola needs additional time to respond to the subpoena. I told you that, in view of the foregoing, MediaTek will seek to obtain from the Court an extension of the current September 11 deadline for taking discovery from Motorola in response to the subpoena. We plan to request a 30-day extension.
- You represented that any sales data held by Motorola that is responsive to MediaTek's subpoena and is older than two years is stored in archives, and Motorola would require between two and three weeks to collect and produce it. You indicated that Motorola could collect and produce to MediaTek responsive sales data going back two years (i.e., from September 2011 forward) by the end of next week (i.e., by September 20).
- You indicated that Motorola would prefer not to produce a witness for a deposition in response to MediaTek's subpoena, and that Motorola would prefer to provide a custodial declaration, in lieu of providing deposition testimony.
- You informed me that if Motorola produces a witness for deposition in response to the subpoena, Motorola will be able to produce its witness for deposition within ten business days of the production of sales data.

Based on your representation regarding Motorola's sales data, MediaTek is willing to limit, and hereby limits, its document requests in its subpoena to sales data for the last two years, dating back to September 2011. Based on our discussion, I understand that Motorola will collect and produce this sales data to us by September 20.

MediaTek believes that a brief deposition of Motorola is needed and, thus, we would like to schedule the deposition. Based on your time estimates from today, it appears that a deposition will be feasible on October 4, 2013. Please confirm Motorola will produce a witness for deposition on October 4. If Motorola is unavailable for deposition on October 4, please identify an alternative date on which Motorola will produce its witness, before October 11.

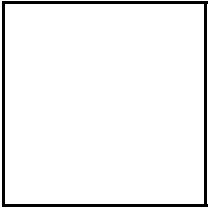
Thanks again, and let me know if you have any questions.

Chris

From: Lubozynski, Matt [<mailto:mlubozynski@kilpatricktownsend.com>]
Sent: Wednesday, September 11, 2013 5:55 AM
To: Franklin, Christopher
Cc: Moore, Steve; Baca, Mike
Subject: MediaTek Subpoena

Chris,

Thanks for speaking with me yesterday. This email will serve to confirm the extension you gave to Motorola Mobility with respect to the subpoena until we have a better idea as to the extension the Court in the underlying case will grant. Also, we have not been able to locate the Freescale chips as yet in Motorola Mobility's system but are in the process of searching for such products, if any exist. As agreed on the call yesterday, I will keep you posted on our collection efforts.



Matt Lubozynski

Kilpatrick Townsend & Stockton LLP

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office 404 745 2582 | fax 404 541 3349

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